

May 18, 2016

Jack E. Housenger, Director
Office of Pesticide Programs
United States Environmental Protection Agency

Linda P. Fried, MD, MPH

Dean and DeLamar Professor
of Public Health

Senior Vice President,
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Re: Columbia Center for Children's Environmental Health Epidemiology Study Data

Dear Mr. Housenger,

Thank you for your letter of April 19, 2016 regarding data that have been collected and analyzed by the Columbia Center for Children's Environmental Health (CCCEH or the "Center") to assess the effects of pesticide exposure on neurodevelopment and other health outcomes. We are grateful for EPA's support of the Center, and pleased that the Center's work on the long-term health effects of urban pollutants, including pesticides, on children in inner-city communities has contributed to EPA's understanding of this area in general, and specifically to its understanding of the effects of organophosphate (OP) pesticide exposure on neurobehavioral development. The fact that cord and maternal blood samples were collected from many cohort subjects recruited prior to the EPA ban on residential use of chlorpyrifos, an insecticide currently under review by EPA, has resulted in a research sample with varying degrees of exposure to this OP pesticide, and has allowed us to analyze the effects of these exposures on birth outcomes and neurodevelopment over time. In addition to publishing the peer-reviewed studies that have been cited by EPA, Center investigators have worked closely with EPA staff and have responded to numerous EPA requests for additional information about these studies; these requests required us to conduct significant additional analyses of our data and resulted in reports submitted to EPA in 2010, 2012, 2015 and, most recently, in February 2016.

In response to the request in your letter for the original ("raw") data on which the Center's published findings are based, we believe we cannot submit this extensive individual level data to EPA in a way that ensures the confidentiality of the children and mothers who are our research subjects. These individuals live in a geographically limited community in New York City, and the data include a large number of detailed sociodemographic and health-related data elements that could potentially be used—alone or in combination with other data sources—to identify research participants. The disclosure of this data would therefore constitute an unwarranted invasion of the personal privacy of these children and their mothers.

In light of these serious confidentiality concerns, we are prepared to work with EPA to determine if we can develop one or more data sets that can be properly de-identified, consistent with our obligation to protect the privacy of our research subjects, and that will also enable EPA to conduct its own analyses in order to address its transparency goals. As an alternative, we again extend the offer we have previously made to share with EPA all of the data underlying the Center's published research, whether produced with federal or non-federal funds, while at the same time safeguarding the confidentiality of our subjects. This would be done by allowing EPA staff to review and/or re-analyze the original individual-level data in a secure data enclave onsite at Columbia. Access to the enclave could be provided as often as needed.

Recognizing the time constraints faced by EPA described in your letter, we are available to meet with your staff as soon as possible to develop plans for providing access to Center data. Howard Andrews, head of the Center's data management core, will coordinate such discussions for Columbia; Howard can be reached at hfa1@columbia.edu.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. P. Fried', with a stylized, flowing script.

Linda P. Fried